

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JUDY JIEN, et al.,  
Plaintiffs,

v.

PERDUE FARMS, INC., et al.,  
Defendants.

Case No. 1:19-CV-2521-SAG

The Honorable Stephanie A. Gallagher

**DEFENDANT FOSTER POULTRY FARMS' MOTION TO DISMISS PLAINTIFFS'  
THIRD AMENDED CONSOLIDATED COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) and L.R. 105, Foster Poultry Farms, by and through its undersigned counsel, move to dismiss Plaintiffs' Third Amended Consolidated Complaint (Dkt. No. 590) with prejudice. Foster Poultry Farms incorporates by reference, as if fully set forth herein, the accompanying Memorandum in Support of the Motion to Dismiss.

WHEREFORE, Foster Poultry Farms respectfully requests that this Court enter an Order dismissing all claims against Foster Poultry Farms from this action.

Date: April 18, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2022, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Carmine R. Zarlenga  
Carmine R. Zarlenga